

Joe Manchin III Governor Stephanie R. Timmermeyer Cabinet Secretary

General Permit Registration



Pursuant to **Title V**of the Clean Air Act

Columbia Gas Transmission Corporation Huff Creek Compressor Station R30-NGGP-2007-10900021 Effective Date: November 20, 2007

> John A. Benedict Director

Date Signed: November 6, 2007

Registration Number: R30-NGGP-2007-10900021
Permittee: Columbia Gas Transmission Corporation
Facility Name: Huff Creek Compressor Station
Mailing Address: 1700 MacCorkle Avenue, SE

Charleston, WV 25314

Permit Contact: **Kasey Gabbard, NiSource EH&S** *Phone:* (304) 357-2079 *Fax:* (304) 357-2770

This Registration is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this Registration and of Permit Number R30-NGGP-2007.

Facility Location: Hanover, Wyoming County, West Virginia

Mailing Address: State Route 8, Little Huff Creek Road, Hanover, WV 24839

Telephone Number: (304) 938-4910
Type of Business Entity: Corporation
Facility ID #: 109-00021

Facility Description: Natural Gas Transmission Facility

SIC Codes: 4922

UTM Coordinates: 430.4 km Easting • 4156.1 km Northing • Zone 17

Permit Writer: U.K.Bachhawat

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

Issuance of this Title V Operating Permit Registration does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

Emission Units

| Emission Unit ID | Emission Point ID | Emission Unit Description (Make, Model, Serial No.) | Year Installed | Design Capacity | Control Device | Applicable Natural Gas General Permit (R30-NGGP-2007) Sections |
|---------------------|----------------------|---|-------------------|--------------------|-------------------|---|
| | | Facility-wide | | | | Section 2.0, Sections 3.1.1 to 3.1.8, 3.1.14, 3.1.15, 3.2, 3.3, 3.4, 3.5 & 3.7. |
| BLR1* | BL1 | Dehydrator Reboiler; Natco | 1990 | 1.25 MMBtu/hr | None | Section 4.0 |
| BLR2* | BL2 | Heating System Boiler; American Standard; Model # 4-G11 | 1948 | 0.96 MMBtu/hr | None | Section 4.0 |
| BLR3* | BL3 | Heating Boiler; Hydrotherm | 1997 | 1.2 MMBtu/hr | None | R13-2066C Section 4.0 |
| 01701* | E01 | Reciprocating Engine/Integral Compressor; Clark RA-8; 2-cycle, lean burn | 1964 | 800 HP | None | R13-2066C Sections 6.2.2, 6.2.3, 6.3.1, 6.4.1 |
| 01702* | E02 | Reciprocating Engine/Integral Compressor; Clark RA-8; 2-cycle, lean burn | 1964 | 800 HP | None | R13-2066C Sections 6.2.2, 6.2.3, 6.3.1, 6.4.1 |
| 01703* | E03 | Reciprocating Engine/Integral Compressor; Cooper Bessemer GMV-8-TF; 2-cycle, lean burn | 1958 | 880 HP | None | R13-2066C Sections 6.2.2, 6.2.3, 6.3.1, 6.4.1 |
| 01704* | E04 | Reciprocating Engine/Integral Compressor; Waukesha F1905 GRU; 4-cycle, rich burn | 1982 | 206 HP | None | None |
| 01705* | E05 | Reciprocating Engine/Integral Compressor; Cooper-Bessemer GMWR-8V-275; 2-cycle, lean burn | 1997 | 3,712 HP | None | R13-2066C Sections 6.2.2, 6.2.3, 6.3.1, 6.4.1 |
| 017A1* | AC1 | Reciprocating Engine/Air Compressor; LeRoi D- 226; 4-cycle, rich burn | 1948 | 20 HP | None | None |
| 017F1* | F1 | Reciprocating Engine/Fin Fan Cooler; Allis Chalmer B-125; 4-cycle, rich burn | 1958 | 20 HP | None | None |
| 017G1* | G1 | Reciprocating Engine/Generator; LeRoi 75AF1500; 4-cycle, rich burn | 1970 | 142 HP | None | None |
| 017G2* | G2 | Reciprocating Engine/Generator; LeRoi 75AF1500; 4-cycle, rich burn | 1970 | 142 HP | None | None |
| 017G3* | G3 | Reciprocating Engine/Generator; Waukesha H24GLD; 4-cycle, lean burn | 1997 | 530 HP | None | R13-2066C Sections 6.2.2, 6.2.3, 6.3.1, 6.4.1 |
| 017P2* | P2 | Reciprocating Engine/Fire Pump; LeRoi D-226; 4-cycle, rich burn | 1948 | 20 HP | None | None |
| TEGDEHY1* | D1 | TEG Dehydrator; Natco | 1990 | 3.1 MMscf/Day | None | Sections 3.1.12, 3.1.13 |

^{*} All equipment is fueled exclusively with pipeline quality natural gas.

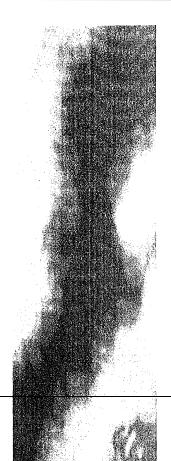
45CSR13/14 permits, Consent Orders and Other Specific Requirements not included in Title V General Permit:

1. **R13-2066C**.

- 2. 40 C.F.R. 63 Subpart HHH exemption Annual Average Flow Of Gas Exemption (10 mmscf/day) or actual annual average benzene<0.90 megagram.
 - §63.1274 (d) *Exemptions*. The owner or operator is exempt from the requirements of §63.1274 (c) if the criteria listed in paragraph (d)(1) or (2) of this section are met, except that the records of the determination of these criteria must be maintained as required in §63.1284(d).
 - (1) The actual annual average flow of gas to the glycol dehydration unit is less than 283.0 thousand standard cubic meters per day, as determined by the procedures specified in §63.1282(a)(1); or
 - (2) The actual average emissions of benzene from the glycol dehydration unit process vents to the atmosphere are less than 0.90 megagram per year as determined by the procedures specified in § 63.1282(a)(2).
 - §63.1282 (a) Determination of glycol dehydration unit flowrate or benzene emissions. The procedures of this paragraph shall be used by an owner or operator to determine glycol dehydration unit natural gas flowrate or benzene emissions to meet the criteria for the exemption from control requirements under §63.1274(d).
 - (1) The determination of actual flowrate of natural gas to a glycol dehydration unit shall be made using the procedures of either paragraph (a)(1)(i) or (a)(1)(i) of this section.
 - (i) The owner or operator shall install and operate a monitoring instrument that directly measures natural gas flowrate to the glycol dehydration unit with an accuracy of plus or minus 2 percent or better. The owner or operator shall convert the annual natural gas flowrate to a daily average by dividing the annual flowrate by the number of days per year the glycol dehydration unit processed natural gas.
 - (ii) The owner or operator shall document, to the Administrator's satisfaction, that the actual annual average natural gas flowrate to the glycol dehydration unit is less than 283.0 thousand standard cubic meters per day.
 - (2) The determination of actual average benzene emissions from a glycol dehydration unit shall be made using the procedures of either paragraph (a)(2)(i) of this section. Emissions shall be determined either uncontrolled or with federally enforceable controls in place.
 - (i) The owner or operator shall determine actual average benzene emissions using the model GRI-GLYCalcTM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalcTM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1);
 - §63.1284 (d) An owner or operator that is exempt from control requirements under §63.1274(d) shall maintain the records specified in paragraph (d)(1) or (d)(2) of this section, as appropriate, for each glycol dehydration unit that is not controlled according to the requirements of §63.1274(c).

- (1) The actual annual average natural gas throughput (in terms of natural gas flowrate to the glycol dehydration unit per day), as determined in accordance with §63.1282(a)(1);
- (2) The actual average benzene emissions (in terms of benzene emissions per year), as determined in accordance with § 63.1282(a)(2).

[40 C.F.R 63 Subpart HHH] [TEGDEHY1]



West Virginia Department of Environmental Protection

Joe Manchin, III

Division of Air Quality

Cabinet Secretary

Permit to Modify

Class I Administrative Update



R13-2066C

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:

Columbia Gas Transmission Corp. Huff Compressor Station

109-00021

Entire Document NON-CONFIDENTIAL

John A. Benedict Director

Issued: April 25, 2006 • Effective: April 25, 2006

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Columbia Gas Transmission Corp. • Huff Compressor Station

This permit will supercede and replace Permit R13-2066B.

Facility Location:

Hanover, Wyoming County, West Virginia 1700 MacCorkle Avenue, Charleston, WV 25304

Mailing Address: Facility Description:

Natural Gas Compressor Station

SIC Codes:

4922

UTM Coordinates:

430.4 km Easting • 4156.1 km Northing • Zone 17

Permit Type:

Class I Administrative Update

Description of Change:

Update emissions based on new emission factors.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

The source is subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

Permit R13-2066C Columbia Gas Transmission Corp. • Huff Compressor Station

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West Virginia Department of Environmental Protection • Division of Air Quality

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1.0. Emission Units

| Emission Unit ID | Emission Point ID | Emission Unit Description |
|---------------------|----------------------|---|
| 01701 | E01 | Clark RA-8 (800 HP engine) |
| 01702 | E02 | Clark RA-8 (800 HP engine) |
| 01703 | E03 | Cooper-Bessemer GMV-8TF (880 HP engine) |
| 01704 | E04 | Waukesha F1905GR (206 HP engine) |
| 01705 | E05 | Cooper-Bessemer GMWR-8V-275 (3,712 HP engine) |
| 017F1 | F1 | Allis Chambers B-125 (20 HP engine) |
| 017G1 | G1 | Leroi 75AF1500 (142 HP engine) |
| 017G2 | G2 | Leroi 75AF1500 (142 HP engine) |
| 017G3 | G3 | Waukesha H24GDL (530 HP) |
| 017P2 | P2 | Leroi D226 (20 HP) |
| TEGDEHY1 | D1 · | 3.1 MMSCF/Day NATCO Glycol Dehydrator |
| BLR1 | BL1 | TEG DEHY #1 Boiler (1.25 MMBtu/hr) |
| BLR2 | BL2 | Heating System Boiler #1 (0.96 MMBtu/hr) |
| BLR3 | BL3 | Heating System Boiler #2 (1.2 MMBtu/hr) |

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2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

| CAAA CBI CEM CES C.F.R. or CFR CO | Clean Air Act Amendments Confidential Business Information Continuous Emission Monitor Certified Emission Statement Code of Federal Regulations Carbon Monoxide | NO _X NSPS PM PM _{2.5} | Nitrogen Oxides New Source Performance Standards Particulate Matter Particulate Matter less than 2.5 µm in diameter Particulate Matter less than |
|--|--|---|--|
| C.S.R. or CSR DAQ | Codes of State Rules Division of Air Quality | Ppb | 10µm in diameter Pounds per Batch |
| DEP | Department of Environmental Protection Dry Standard Cubic Meter | Pph Ppm | Pounds per Hour Parts per Million Parts per Million by Volume |
| dsem FOIA HAP HON HP lbs/hr LDAR M MACT MDHI MM MMBtu/hr or mmbtu/hr MMCF/hr or mmef/hr NA | Dry Standard Cubic Meter Freedom of Information Act Hazardous Air Pollutant Hazardous Organic NESHAP Horsepower Pounds per Hour Leak Detection and Repair Thousand Maximum Achievable Control Technology Maximum Design Heat Input Million Million British Thermal Units per Hour Million Cubic Feet per Hour Not Applicable | Ppm _V or ppmv PSD Psi SIC SIP SO ₂ TAP TPY TRS TSP USEPA UTM VEE | Parts per Million by Volume Prevention of Significant Deterioration Pounds per Square Inch Standard Industrial Classification State Implementation Plan Sulfur Dioxide Toxic Air Pollutant Tons per Year Total Reduced Sulfur Total Suspended Particulate United States Environmental Protection Agency Universal Transverse Mercator Visual Emissions Evaluation |
| NAAQS NESHAPS | National Ambient Air Quality Standards National Emissions Standards for Hazardous Air Pollutants | VOC VOL | Volatile Organic Compounds Volatile Organic Liquids |

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2.3. Authority

This permit is issued in accordance with West Virginia air pollution control law W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

2.3.1. 45CSR13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;

2.4. Term and Renewal

2.4.1. This permit supersedes and replaces previously issued Permit R13-2066B. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

2.5. Duty to Comply

2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Applications R13-2066, R13-2066A, R13-2066B, R13-2066C, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;

[45CSR§§13-5.11 and -10.3.]

- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and/or the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

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2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR\$13-4.]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

2.10 Major Permit Modification

The permittee may request a major modification to this permit as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

[45CSR§14-7 or 45CSR§19-14]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- At all reasonable times (including all times in which the facility is in operation) enter upon the
 permittee's premises where a source is located or emissions related activity is conducted, or where
 records must be kept under the conditions of this permit;
- Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by

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improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5 The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

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2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1.]

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

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3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. Open burning. The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
 [45CSR§6-3.1.]
- 3.1.2. Open burning exemptions. The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
 [45CSR§6-3.2.]
- 3.1.3. Asbestos. The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health Environmental Health require a copy of this notice to be sent to them.
 [40CFR§61.145(b) and 45CSR§15]
- 3.1.4. Odor. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
 [45CSR§4-3.1] [State Enforceable Only]
- 3.1.5. Permanent shutdown. A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
 [45CSR§13-10.5.]
- 3.1.6. Standby plan for reducing emissions. When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
 [45CSR\$11-5.2.]

3.2. Monitoring Requirements [Reserved]

3.3. Testing Requirements

3.3.1. Stack testing. As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary

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exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

[WV Code § 22-5-4(a)(15)]

3.4. Recordkeeping Requirements

3.4.1. Retention of records. The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

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3.4.2. Odors. For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

[45CSR§4. State Enforceable Only.]

3.5. Reporting Requirements

- 3.5.1. Responsible official. Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- 3.5.2. Confidential information. A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. Correspondence. All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

| If to the DAQ: Director WVDEP | If to the US EPA: Associate Director Office of Enforcement and Permits Review |
|-------------------------------|---|
| Division of Air Quality | (3AP12) |
| 601 57 th Street | U.S. Environmental Protection Agency |
| Charleston, WV 25304-2345 | Region III |
| | 1650 Arch Street |
| | Philadelphia, PA 19103-2029 |

3.5.4. Operating Fee

- 3.5.4.1. In accordance with 45CSR30 Operating Permit Program, the permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
- 3.5.5. Emission inventory. At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

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4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. Emissions from the 3,712 HP compressor engine (E05, Cooper-Bessemer GMWR-8V-275) shall not exceed the following:

| Pollutant | Maximum Contr | olled Emission Rate |
|----------------------------|----------------|---------------------|
| | Hourly (lb/hr) | Annual (tons/year) |
| Nitrogen Oxides | 10.23 | 44.81 |
| Carbon Monoxide | 16.37 | 71.70 |
| Volatile Organic Compounds | 8.18 | 35.83 |
| Particulate Matter-10 | 1.22 | 5.34 |

4.1.2. The following engines/compressors shall not exceed the following natural gas consumption limits (cubic feet/year):

| Emission Point ID | Source ID | Natural Gas Consumption |
|-------------------|-----------|-------------------------|
| E01 | 01701 | 38.37 MM cf/yr |
| E02 | 01702 | 30.76 MM cf/yr |
| E03 | 01703 | 64.74 MM cf/yr |
| E05 | 01705 | 278.38 MM cf/yr |

4.1.3. Nitrogen Oxide (NOx) emissions from the following engines shall be limited to the following:

| T T TD | C VD | 15 15 |
|-------------------|-----------|------------------------------|
| Emission Point ID | Source ID | Annual Emissions (tons/year) |
| E01 | 01701 | 41.83 |
| E02 | 01702 | 33.59 |
| E03 | 01703 | 87.51 |

- 4.1.4. The 1.2 MMBtu/hr natural gas fired Boiler (BL3) shall be limited to 6,100 hours of operation per year.
- 4.1.5. The combined maximum emission rate from the 3,712 HP compressor engine (E05, Cooper-Bessemer GMWR-8V-275) and the 530 HP generator (G3, Waukesha H24GDL) shall not exceed 17,825 lbs/yr of formaldehyde.
- 4.1.6. The combined maximum emission rate from the 3,712 HP compressor engine (E05, Cooper-Bessemer GMWR-8V-275) and the 530 HP generator (G3, Waukesha H24GDL) shall not exceed 517 lbs/yr of benzene.
- 4.1.7. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit (BL3) which is greater than ten (10) percent opacity based on a six minute block average.
 [45CSR§2-3.1.]

4.2. Monitoring Requirements

4.2.1. At such reasonable times as the Secretary may designate, the permittee shall conduct Method 9 emission observations for the purpose of demonstrating compliance with Section 4.1.7. Method 9 shall be conducted in accordance with 40 CFR 60 Appendix A.

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4.3. Testing Requirements

N/A - See Facility-Wide Testing Requirements

4.4. Recordkeeping Requirements

- 4.4.1. To demonstrate compliance with section 4.1.1, 4.1.2, and 4.1.3, the permittee shall maintain records of the amount of natural gas consumed in each engine and the hours of operation of each engine. Said records shall be maintained on site for a period of five (5) years. Said records shall be made available to the Director of the Division of Air Quality of his/her duly authorized representative upon request and shall be certified by a responsible official upon submittal.
- 4.4.2. To demonstrate compliance with section 4.1.4, the permittee shall maintain records of the hours of operation of boiler BL3. Said records shall be maintained on site for a period of five (5) years. Said records shall be made available to the Director of the Division of Air Quality of his/her duly authorized representative upon request and shall be certified by a responsible official upon submittal.
- 4.4.3. To demonstrate compliance with section 4.1.5 and 4.1.6, the permittee shall maintain records of operations that verify compliance. Said records shall be maintained on site for a period of five (5) years. Said records shall be made available to the Director of the Division of Air Quality of his/her duly authorized representative upon request and shall be certified by a responsible official upon submittal.

4.5. Reporting Requirements

N/A - See Facility-Wide Reporting Requirements

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CERTIFICATION OF DATA ACCURACY

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